

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

James John Todd Kincannon,

Plaintiff,

v.

Nicole Howland,

Defendant.

Civil Action No. __ : __ -CV- __ - __

**PLAINTIFF'S UNCONDITIONAL
WAIVER OF PRO SE RIGHTS**

Plaintiff James John Todd Kincannon hereby waives all special rights afforded pro se litigants by this Court, including but not limited to rights to notice of the effect of motions for judgment as a matter of law under Roseboro v. Garrison, 528 F.2d 309 (4th Cir. 1975). Plaintiff is an inactive member of the South Carolina Bar, the Bar of the District of South Carolina, the Bar of the District of Colorado, and the Bar of the Fourth Circuit Court of Appeals who is qualifiable as an expert witness in civil litigation before all trial and appellate courts having jurisdiction over ordinary civil cases and ordinary appeals in cases and controversies before the South Carolina Unified Judicial System and before the courts of the United States in which original venue is within the District of South Carolina. Plaintiff does not seek any special pro se rights, and the Court is free to regard this matter as an ordinary civil case filed by a represented litigant if it chooses.

Respectfully submitted,


J. TODD KINCANNON
PLAINTIFF PRO SE
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February 3, 2017